

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-cv-6563-LJL

**PLAINTIFFS' NOTICE OF MOTION TO HOLD  
DEFENDANT IN CIVIL CONTEMPT AND TO IMPOSE SANCTIONS**

PLEASE TAKE NOTICE, that Plaintiffs Ruby Freeman and Wandrea' Moss move pursuant to Federal Rule of Civil Procedure 37 and the Court's inherent authority for an order holding Defendant Rudolph W. Giuliani in civil contempt and imposing sanctions. In support of this motion, Plaintiffs submit the accompanying memorandum of law and supporting papers.

Dated: December 5, 2024

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Respectfully submitted,

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